The Honorable Richard A. Jones 1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 10 GETTY IMAGES, INC., a Delaware Corporation. Case No. 2:16-cv-1892 11 Plaintiff, **DECLARATION OF JONATHAN AMES** 12 IN SUPPORT IN SUPPORT OF PLAINTIFF'S MOTION FOR VS. 13 **SUMMARY JUDGMENT** 14 ROXANNE MOTAMEDI, an individual, 15 Defendant. 16 17 I, Jonathan Ames, declare as follows: 18 I have been employed by a wholly owned subsidiary of Getty Images, Inc. since 19 2011 and currently hold the position of Corporate Counsel, Director in the Los Angeles, 20 California office. I am over 18 years of age, have personal knowledge of the facts set forth in 21 this declaration, and am competent to testify to them. 22 2. On April 12, 2017, I was notified by Larry Busacca, Getty Images' Senior 23 Director, North America Entertainment, that Ms. Motamedi still listed Getty Images as her job 24 on LinkedIn. Mr. Busacca forwarded screenshots of Ms. Motamedi commenting on another 25 LinkedIn member's profile, which showed her as a VP at Getty Images. Attached hereto as 26 Exhibit 1 is a true and correct copy of the email and screenshots I received from Mr. Busacca. 27 28

DECLARATION OF JONATHAN AMES - 1

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1	3. I then screen-grabbed Ms. Motamedi's profile on LinkedIn and saw that her
2	LinkedIn "headline" is inaccurate and misleading to the public. This is especially confusing
3	when she comments on other people's social media on LinkedIn, because all one can see is a
4	reference to Getty Images. It looks like she is still a current employee. Attached hereto as
5	Exhibit 2 is a true and correct copy of the screen-grab of Ms. Motamedi's LinkedIn profile.
6	
7	I declare under the penalty of perjury under the laws of the United States that the
8	foregoing is true and correct.
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10	DATED this 3 day of October, 2017, at los Angels, California.
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13	Jonathan Ames
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Exhibit 1



From: Larry Busacca

Sent: Wednesday, April 12, 2017 6:10 AM **To:** Jon Ames <Jon.Ames@gettyimages.com>

Subject: Info RM

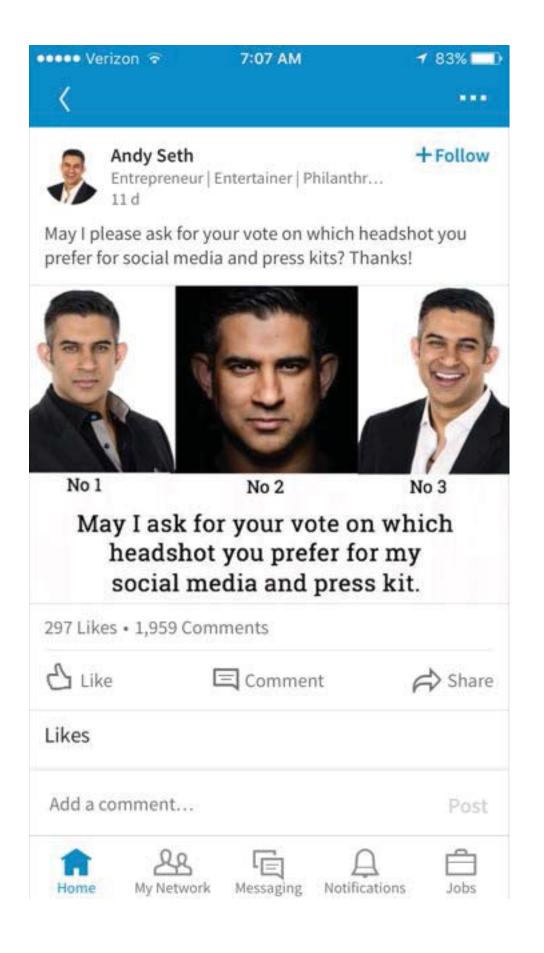
Why is she allowed to still list Getty as her job on Linkedin? See attached. First frame is the top half second is the scroll down. She is commenting and it shows she is a VP at Getty.

Larry Busacca | Senior Director, North America Entertainment p: +1 16466133718 | m: 917-763-5155

gettyimages | iStock







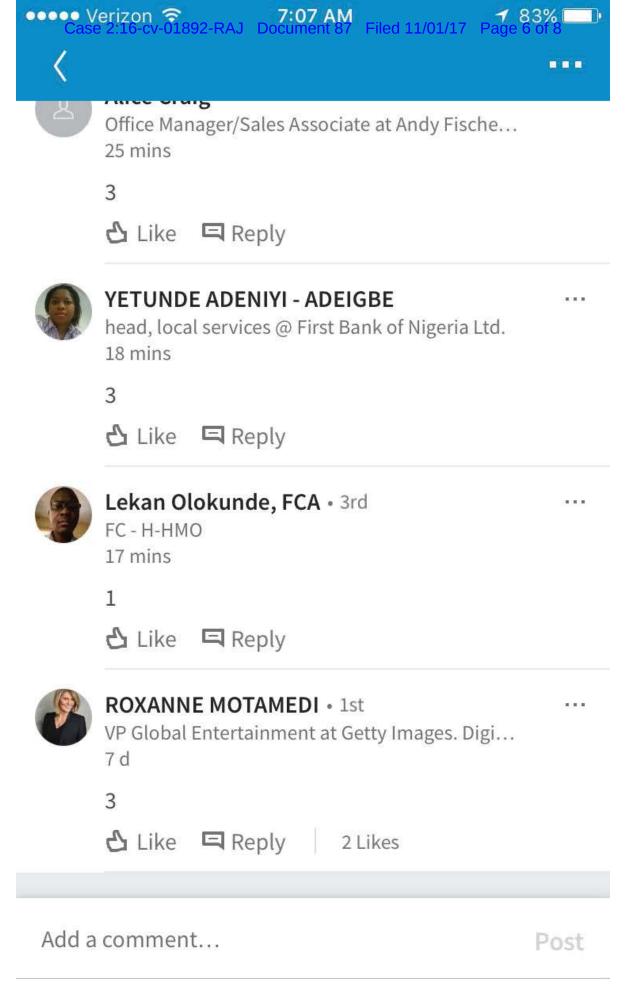












Exhibit 2





ROXANNE MOTAMEDI

VP Global Entertainment at Getty Images. Digital Strategy & Partnerships, Strategic Business

Development. Until Nov 2016

Getty Images • Bard College
Greater Los Angeles Area • 500+ &

Message

Highlights